

Wilfred L. Lee Jr
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Pro Se Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Wilfred L. Lee Jr.)	
Plaintiff,)	
)	CIVIL NO. 4 - 21 CV - 00923 - Y - BJ
vs.)	
)	
20/20 Communications, Inc)	
aka 20/20 Companies)	
And Entity and Entities, Singular)	
And Plural, Known and Unknown)	
Past and Present et.al)	
Defendant(s),)	
_____)	

**PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS
AGAINST DEFENDANT 20/20 COMMUNICATIONS, INC.**

Honorable Judge Means, the Pro Se Plaintiff Motion the Court for Rule 11 Sanctions
against Defendant 20/20 Communications, Inc.

Fed. R. Civ. P. Rule 11(b) states, by presenting to the court a pleading, written motion, or
other paper—whether by signing, filing, submitting, or later advocating it—an attorney or
unrepresented party certifies that to the best of the person's knowledge, information, and belief,

formed after an inquiry reasonable under the circumstances, Rule 11 requires; (1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of Litigation; (4) the denials of factual contentions are warranted on the evidence or, if specifically so identified, are reasonably based on belief or a lack of information. The Defendant is in violation of Fed. R. Civ. P. Rule 11(b)(1)&(4) when filing on February 16, 2022 Defendant 20/20 Communications, Inc., Original Answer [Doc.45] to Plaintiff's Second Amended Complaint [Doc. 40]. Plaintiff's Memorandum and Appendix in Support are attached to this Motion.

WHEREFORE, the Pro Se Plaintiff request that the Court order sanctions against the Defendant 20/20 Communications, Inc., for Rule 11(b)(1)&(4) violations. In the Inherent Power of the Court issue a order for the following sanctions, striking Defendant's Original Answer To Plaintiff's Second Amended Complaint" Doc[45] with Prejudice, award the Plaintiff's reasonable expenses incurred from making the motion be paid by Defendant 20/20 Communications, Inc.

CERTIFICATE OF CONFERENCE

On March 3, 2022, I conferred with Michael R. Buchanan, attorney for Defendant. I provided Mr. Buchanan documents proving Defendant's denials unwarranted by the evidence. Upon which there's been no further communication from Defendant's regarding an oppose or unopposed position to this motion.

Dated: April 6th, 2022

Respectfully Submitted,

/s/ Wilfred L. Lee Jr.

Pro Se Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of April, 2022 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Wilfred L. Lee Jr.

Wilfred L. Lee Jr.

Pro Se Plaintiff